

IN THE UNITED STATES BANKRUPTCY COURT  
District of Puerto Rico

**In the Matter of:**

MIGUEL LEONARDO ALVAREZ BENITEZ  
CARMEN DOLORES CASANOVA TOLEDO

Debtor(s)

Case No. 13-06147 BKT

Chapter 13

**OPPOSITION TO DISMISSAL**

**TO THE HONORABLE COURT:**

The undersigned, attorney for the above-named debtor, notifies the Court as follows,

1. The trustee filed a motion requesting the dismissal of present case due to failure to provide for creditor Scotiabank. We have filed a motion to avoid lien on property of debtor and this should be address the issue raised in the motion for dismissal.
2. Debtors have also amended their plan dated August 5, 2013 to increase the base,, make reference to motion to avoid lien and provide for payment to secured claim by IRS. These actions should address the issues raised in the trustee's motion to dismiss.

**WHEREFORE**, we respectfully request from this Honorable Court to take notice of the informed above and deny motion to dismiss.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY**, that on this same date a true and exact copy of the foregoing has been filed with the Clerk of the Court that will be notified to the Chapter 13 Trustee Alejandro OLiveras Rivera and all other appearing parties using the Court's CM/ECF system. Non appearing parties will be notified by U. S. regular mail as per Master Address List attached.

In Vega Baja, Puerto Rico, on this August 6, 2013

s/ Juan O. Calderon Lithgow  
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